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July 8, 2019

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Ramses Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

We represent defendant Richard Gaffey in the above-referenced matter. At the status conference on May 29, 2019, the Court directed that any motions to suppress should be filed by July 8, 2019. We are writing to inform the Court that Mr. Gaffey is not planning to file a suppression motion today. However, as the Court knows, we have expressed concerns that the search of Mr. Gaffey's accounting firm, Elder, Gaffey & Paine, P.C., was overbroad. To that end, Mr. Gaffey has moved for an order compelling the government to disclose the search terms that the government used to search and review the vast amount of electronically stored information seized from the firm during the search. Mr. Gaffey is therefore respectfully reserving his right to renew his request to file such a suppression motion pending the resolution of his motion for disclosure of the search terms and his review of those terms.

Respectfully submitted,

Robert B. Buehler

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